

Indiana Department of Environmental Management

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan Governor

Lori F. Kaplan Commissioner

December 15, 2003

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: flexcel-Jasper Power Drive / 037-18203-00085

FROM: Paul Dubenetzky

Chief, Permits Branch Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, within eighteen (18) days of the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- the date the document is delivered to the Office of Environmental Adjudication (OEA); (1)
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3)The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit. decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- the name and address of the person making the request; (1)
- (2) the interest of the person making the request;
- identification of any persons represented by the person making the request; (3)
- the reasons, with particularity, for the request; (4)
- the issues, with particularity, proposed for considerations at any hearing; and (5)
- identification of the terms and conditions which, in the judgment of the person making the request, (6) would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.



Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency 401 M Street Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

December 15, 2003

Randy Keefer flexcel - Jasper Power Drive (f.k.a. Jasper Plastics Division of Kimball International) 1220 Power Drive Jasper IN 47546-2576

Re: 037-18203

Third Significant Permit Modification to Part 70 Permit 037-6952-00085

Dear Mr. Keefer:

flexcel – Jasper Power Drive, formerly known as Jasper Plastics Division of Kimball International, was issued a Part 70 permit on March 28, 2002 for a furniture parts manufacturing plant located at 1220 Power Drive, Jasper, Indiana. An application to modify the source was received on October 2, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of limiting individual and combined hazardous air pollutants (HAP) emissions from the entire source to less than ten (10) and less than twenty-five (25) tons per year respectively, in order to classify the source as an area source for HAPs.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik at (800) 451-6027, press 0, extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original Signed by Paul Dubenetzky Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments mm

cc: File - Dubois County

U.S. EPA, Region V

Dubois County Health Department

Air Compliance Section Inspector - Gene Kelso Compliance Data Section - Karen Ampil

Administrative and Development

Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

flexcel - Jasper Power Drive

(f.k.a. Jasper Plastics Division of Kimball International)

1220 Power Drive Jasper, IN 47549

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: T037-6952-00085 | | | | |
|--|---|--|--|--|
| lssued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality | Issuance Date: March 28, 2002 Expiration Date: March 28, 2007 | | | |

| Third Significant Permit Modification No.: 037-18203 | Pages Modified: 3, 26, 26a, 35, 36, 36a |
|---|---|
| Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: December 15, 2003 |

3rd Significant Permit Mod. No.: 037-18203 Page 3 of 38 Modified By: Madhurima D. Moulik OP No. T 037-6952-00085

flexcel – Jasper Power Drive Jasper, Indiana Permit Reviewer: Amy Cook

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Response Plan Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Operation

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Operating Requirements When Coating Wood Furniture [326 IAC 8-2-12]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.3 Single and Combined Hazardous Air Pollutant (HAP) Limits
- D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.5 Particulate Matter (PM) [326 IAC 6-1-2]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.7 Volatile Organic Compounds (VOC)
- D.1.8 VOC Emissions
- D.1.9 Compliance Determination, Single and Combined HAP Limits

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.10 Particulate Matter (PM)
- D.1.11 Monitoring
- D.1.12 Compliance Monitoring, Single and Combined HAP Limits

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.13 Record Keeping Requirements
- D.1.14 Record Keeping, Single and Combined HAP Limits
- D.1.15 Reporting Requirements
- D.1.16 Reporting Requirements, Single and Combined HAP Limits

D.2 FACILITY OPERATION CONDITIONS - Insignificant Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IA C 6-1-2]

Certification

Emergency Occurrence Report

Quarterly Reports

Quarterly Deviation and Compliance Monitoring Report

flexcel - Jasper Power Drive 3rd Significant Permit Mod. No.: 037-18203 Modified By: Madhurima D. Moulik

Jasper Indiana Permit Reviewer: Amy Cook

Single and Combined Hazardous Air Pollutant (HAP) Limits D.1.3

The owner or operator shall limit the wood furniture coating and solvent single and combined HAP potential to emit to less than 10 and 25 tons per consecutive 12 month period, respectively, with compliance being demonstrated at the end of each month. This shall ensure that there are no applicable requirements under 40 CFR 43 (NESHAP, Subpart JJ) – Standards for Wood Furniture Manufacturing.

Page 26 of 38 OP No. T 037-6952-00085

(b) The owner or operator shall limit the entire source (including wood and plastic coating and solvent) single and combined HAP potential to emit to less than 10 and 25 tons per consecutive 12 month period, with compliance determined at the end of each month. This limit shall ensure that the source shall not be subject to the requirements of NESHAP (40 CFR 63, Subpart WWWW) - Standards for Reinforced Plastic Composites Production and NESHAP (40 CFR 63, Subpart PPPP) – Standards for Plastic Parts and Products Surface Coating.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- This source shall use less than two hundred fifty (250) tons of VOC, including coating, dilution (a) solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than two hundred fifty (250) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) The following conditions are no longer applicable because the source has requested a less than two hundred fifty (250) ton per year synthetic limit in order to avoid PSD. Therefore, Jasper Plastics is considered minor for PSD.
 - Pursuant to CP (19) 1863, issued on August 23, 1990, the 10 spray booths (SB17 -(1) SB26) plus the 16 spray booths (SB1 - SB16) shall use less than 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 246 tons per 12 consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
 - (2)Pursuant to CP 037-3992, issued on January 3, 1995, Operating Condition 4(a), the total amount of volatile organic compound (VOC) delivered to each of the 2 spray booths (I&K and 30) shall not exceed 39.6 tons per year. This condition will make the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations) the particulate matter (PM) from the spray booths (SB1 - SB26; SB30; I&K) shall be limited to 0.03 grains per dry standard cubic foot.

Preventive Maintenance Plan [326 IAC 2-7-5(13)] D.1.6

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

Volatile Organic Compounds (VOC) D.1.7

Compliance with the VOC content and usage limitations contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

flexcel – Jasper Power Drive Jasper, Indiana Permit Reviewer: Amy Cook 3rd Significant Permit Mod. No.: 037-18203 Modified By: Madhurima D. Moulik Page 26a of 38 OP No. T 037-6952-00085

D.1.8 VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of_each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.9 Compliance Determination, Single and Combined HAP Limits

To determine compliance with the limits of Condition D.1.3, the owner or operator shall, on a monthly basis:

flexcel – Jasper Power Drive Jasper, Indiana Permit Reviewer: Amy Cook 3rd Significant Permit Mod. No.: 037-18203 Modified By: Madhurima D. Moulik

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

| Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facilities: Parameter: Limit: | and 30) Worst Case Single I | lasper, IN 47549 , Jasper, IN 47549 ating and Solvent -Twenty-eigh HAP er consecutive 12 month perio | nt (28) Spray Booths (SB1 - SB26; I& od with compliance determined at the |
|---|--------------------------------|--|--|
| Month | Column 1 | Column 2 | Column 1 + Column 2 |
| MOHH | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |
| | ∠ Deviation/s | n occurred in this quarter. occurred in this quarter. | |
| | | reported on: | |
| | Title / Position: | | |

Attach a signed certification to complete this report.

flexcel – Jasper Power Drive Jasper, Indiana Permit Reviewer: Amy Cook 3rd Significant Permit Mod. No.: 037-18203 Modified By: Madhurima D. Moulik

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

| Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facilities: Parameter: Limit: | and 30) Combined HAPs | asper, IN 47549 Jasper, IN 47549 ting and Solvent -Twenty-eigher consecutive 12 month period | nt (28) Spray Booths (SB1 - SB26; I&K d with compliance determined at the |
|---|--|--|--|
| | Column 1 | Column 2 | Column 1 + Column 2 |
| Month | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |
| | Deviation/s of Deviation has been in Submitted by: Title / Position: | occurred in this quarter. occurred in this quarter. reported on: | |

Attach a signed certification to complete this report.

flexcel – Jasper Power Drive Jasper, Indiana Permit Reviewer: A my Cook 3rd Significant Permit Mod. No.: 037-18203 Modified By: Madhurima D. Moulik Page 36a of 38 OP No. T 037-6952-00085

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

| Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facilities: Parameter: Limit: | Less than 10 tons are compliance determine | asper, IN 47549 | |
|---|---|--|---|
| Month | (a) Single HAP/Combined HAP Emissions This Month (Tons) | (b) Single HAP/Combined HAP Emissions From the Previous 11 Months (Tons) | (a) + (b) Single HAP/ Combined HAP Emissions for the Consecutive 12 Month Period (Tons) |
| 1 | (rone) | (10110) | (10110) |
| 2 | | | |
| 3 | | | |
| | Deviation has been submitted by: | occurred in this quarter. occurred in this quarter. reported on: | |

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name: flexcel- Jasper Power Drive

Source Location: 1220 Power Drive, Jasper, IN 47549 (in the W. 12th Ave Kimball

Industrial Complex)

County: Dubois SIC Code: 3089

Operation Permit No.: T037-6952-00085
Operation Permit Issuance Date: March 28, 2003
Significant Permit Modification No.: 037-18203

Permit Reviewer: Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from flexcel-Jasper Power Drive, formerly known as Jasper Plastics division of Kimball International, relating to the operation of a molded plastic parts manufacturing operation for the furniture industry.

History

flexcel - Jasper Power Drive, formerly known as Jasper Plastics division of Kimball International, was issued a Part 70 permit on March 28, 2003. On March 6, 2003, the source received a significant permit modification no. 037-16032-00085 to add wood furniture coating processes to their facility. This addition triggered 40 CFR 63 (NESHAP), Subpart JJ, "National Emission Standards for Wood Furniture Manufacturing Operations". flexcel – Jasper Power Drive, a major source of hazardous air pollutants (HAPs) agreed to limit the wood furniture coating emissions of single and combination of HAPs to 10 and 25 tons per year, respectively. Therefore, even though the source is subject to NESHAP, Subpart JJ, there are no related applicable requirements.

On October 2, 2003, flexcel – Jasper Power Drive, Office of Air Quality (OAQ) received an application from flexcel – Jasper Power Drive, requesting a significant permit modification to their Part 70 permit. In this application, the source requested an enforceable limit on individual and combination HAPs to 10 and 25 tons per year for the entire source, including booth wood and plastics coating processes. This limit would make flexcel – Jasper Power Drive an area source for HAPs. This would make NESHAP (40 CFR 63, Subpart WWWW) – Reinforced Plastics Composites Standards, and NESHAP (40 CFR 63, Subpart PPPP) – Plastic Parts and Products Surface Coating Standards, not applicable.

Because the first compliance date for NESHAP, Subpart JJ – Standards for Wood Furniture Manufacturing Operations, is November, 1997, flexcel – Jasper Power Drive will still be subject to Subpart JJ after this approval which will re-designate the source as an area source for HAPs. This is based on an EPA Memo titled "Potential to Emit for MACT Standards – Guidance on Timing Issues" (Once In- Always In), dated May 16, 1995, which states that a source that switches to an area source status after the first compliance date will still be subject to the MACT standard. However, the 10 and 25 tons per year limit will ensure that there will still be no applicable requirement under this NESHAP.

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

- (a) Part 70 Permit No.: T 037- 6952-00085, issued on March 28, 2002;
- (b) First Significant Permit Modification No.: 037-16032, issued on March 6, 2003; and
- (c) Second Significant Permit Modification No.: 037-15478, issued on April 15, 2003.

flexcel-Jasper Power Drive Jasper, Indiana Permit Reviewer: Madhurima D. Moulik

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Page 2 of 6

SPM No.: 037-18203-00085

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on October 2, 2003.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1), which states that "every significant change in existing monitoring Part 70 permit terms or conditions" shall be considered significant. The requested changes involve significant modifications to emission limits and permit terms and conditions, therefore, a significant permit modification will be issued.

Source Emissions After the Proposed Changes

Emissions after the proposed changes based on emissions after controls and 8760 hours of operation per year at rated capacity:

| Unit | PM | PM10 | SO2 | NOx | VOC | CO | Worst Case | Comb. |
|------------------|-----------|-----------|-----------|-----------|-----------|-----------|-------------|-------------|
| | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | Single HAP | HAPs |
| | | | | | | | (tons/yr) 1 | (tons/yr) 1 |
| Source | >100, | >100, | <100 | <100 | <250 | <100 | <10 | <25 |
| | <250 | <250 | | | | | | |
| | | | | | | | | |
| PSD Major Levels | 250 | 250 | 250 | 250 | 250 | 250 | - | - |
| | | | | | | | | |
| Part 70 Major | - | 100 | 100 | 100 | 100 | 100 | 10 | 10/25 |
| Levels | | | | | | | | |

¹ Source has agreed to a source-wide limit of 10/25 tons per year for single/combination of HA Ps.

County Attainment Status

The source is located in Dubois County.

| Pollutant | Status | |
|-----------|------------|--|
| PM-10 | attainment | |
| SO_2 | attainment | |
| NO_2 | attainment | |
| Ozone | attainment | |
| CO | attainment | |
| Lead | attainment | |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Dubois County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

flexcel-Jasper Power Drive Jasper, Indiana Permit Reviewer: Madhurima D. Moulik

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

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SPM No.: 037-18203-00085

- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart WWWW Standards for Reinforced Plastic Composites Production, because the source has agreed to limit emissions of individual HAPs and a combination of HAPs to less than 10 and 25 tons per year, respectively.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart PPPP Standards for Plastic Parts and Products Surface Coating, because the source has agreed to limit emissions of individual HAPs and a combination of HAPs to less than 10 and 25 tons per year, respectively.
- (d) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJ Standards for Wood Furniture Manufacturing Operations.

Pursuant to 40 CFR Part 63.800(a) the affected source to which Subpart JJ applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components that is located at a plant site that is a Part 70 major source. When the significant permit modification no. 037-16032-00085 was issued, the source was a Part 70 major source and was involved in wood furniture manufacturing. Pursuant to 63.800(b), a source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3), is considered an area source for the purposes of this subpart and are not subject to provisions of the rule. Jasper Plastics was not able to meet the requirements of 63.800(b)(1), (b)(2), or (b)(3). Therefore, the source was determined to be subject to 40 CFR 63, Subpart JJ.

Since the source was subject to NESHAP, Subpart JJ, after the issuance of significant permit modification no. 037-16032-00085, it will still be subject to this NESHAP (with compliance date of November, 1997) after issuance of this permit modification no. 037-18203-00085. This is based on an EPA Memo titled "Potential to Emit for MACT Standards – Guidance on Timing Issues" (Once In- Always In), dated May 16, 1995, which states that a source that switches to an area source status after the first compliance date will still be subject to the MACT standard.

However, 63.800(b) also states that nothing in paragraph 63.800(b) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms. This means if Jasper Plastics limits the hazardous air pollutant (HAP) emissions from the wood furniture manufacturing facilities to less than the major source levels of 10 and 25 tons per year through conventional methods, the source will be considered an area source for the purposes of Subpart JJ, exempting the source from the requirements of Subpart JJ.

In significant permit modification no. 037-16032-00085, Jasper Plastics had proposed single and combined HAP limits of 10 and 25 tons per year, respectively. Thus, while the source is still subject to 40 CFR 63, Subpart JJ, none of the requirements will apply.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

In Part 70 permit No. 037-6952-00085, flexcel – Jasper Power Drive had requested a less than two hundred fifty (250) ton per year cap on the entire source to avoid PSD. The source is not one of the twenty-eight (28) listed source categories. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-4.1 (HAPs Major Sources)

326 IAC 2-4.1 does not apply because the single and combined HAP emissions for the entire source will be limited to less than the applicable levels of 10 and 25 tons per year, respectively.

flexcel-Jasper Power Drive Page 4 of 6
Jasper, Indiana Page 4. SPM No.: 037-18203-00085

Permit Reviewer: Madhurima D. Moulik

The remaining state rule applicabilities for the entire source remains unchanged as a result of this modification.

State Rule Applicability - Individual Facilities

The state rule applicabilities for individual facilities at this source remain unchanged as a result of this modification.

Conclusion

This permit modification shall be added to the conditions of the Part 70 permit as Significant Permit Modification No. 037-18203-00085.

CHANGES TO PART 70 PERMIT

The following lists the changes made to the Part 70 permit (strikeout to show deletions and **bold** to show additions):

- (1) Condition D.1.3 is modified as follows:
 - D.1.3 Single and Combined Hazardous Air Pollutant (HAP) Limits [63.800]
 - (a) The owner or operator shall limit the wood furniture coating and solvent single and combined HAP potential to emit to less than 10 and 25 tons per consecutive 12 month period, respectively, with compliance being demonstrated at the end of each month. This shall ensure that there are no applicable requirements under 40 CFR 63 (NESHAP, Subpart JJ).
 - (b) The owner or operator shall limit the entire source (including wood and plastic coating and solvent) single and combined HAP potential to emit to less than 10 and 25 tons per consecutive 12 month period, respectively, with compliance determined at the end of each month. This limit shall ensure that the source shall not be subject to the requirements of NESHAP (40 CFR 63, Subpart WWWW) –Standards for Reinforced Plastic Composites Production and NESHAP (40 CFR 63 Subpart PPPP) Standards for Plastic Parts and Products Surface Coating.
- (2) The Table of Contents is modified as follows:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Operating Requirements When Coating Wood Furniture [326 IAC 8-2-12]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.3 Single and Combined Hazardous Air Pollutant (HAP) Limits [63.800]
- D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- (3) A Quarterly Report form is added as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: flexcel – Jasper Power Drive
Source Address: 1220 Power Drive, Jasper, IN 47549
Mailing Address: 1220 Power Drive, Jasper, IN 47549

Part 70 Permit No.: T037-6952-00085 Facilities: Entire Source

Parameter: Worst Case Single HAP and Combination of HAPs

flexcel-Jasper Power Drive Page 5 of 6
Jasper, Indiana SPM No.: 037-18203-00085

Permit Reviewer: Madhurima D. Moulik

Limit: Less than 10 tons and less than 25 tons per consecutive 12 month period

with compliance determined at the end of each month

YEAR:

| Month | (a) | (b) | (a) + (b) |
|-------|--|---|--|
| | Single HAP/ Combined HAP Emissions This Month | Single HAP/ Combined HAP Emissions From the Previous 11 Months | Single HAP/ Combined HAP Emissions for the Consecutive 12 Month Period |
| | (Tons) | (Tons) | (Tons) |
| 1 | | | |
| 2 | | | |
| 3 | | | |

- ? No deviation occurred in this quarter.
- ? Deviation/s occurred in this quarter. Deviation has been reported on:

Submitted by: Title / Position: Signature: Date: Phone:

Attach a signed certification to complete this report.

(4) The existing quarterly report forms are modified as follows:

Part 70 Quarterly Report

Source Name: flexcel - Jasper Power Drive

Source Address: 1220 Power Drive, Jasper, IN 47549 Mailing Address: 1600 Royal Avenue, Jasper, IN 47549

Part 70 Permit No.: T037-6952-00085

Facilities: Wood Furniture Coating and Solvent -Twenty-eight (28) Spray Booths (SB1 - SB26;

I&K and 30)

Parameter: Worst Case Single HAP

Limit: Less than 10 tons per consecutive 12 month period with compliance determined at the

end of each month

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Jasper, Indiana SPM No.: 037-18203-00085

Permit Reviewer: Madhurima D. Moulik

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Source Name: flexcel - Jasper Power Drive

Source Address: 1220 Power Drive, Jasper, IN 47549 Mailing Address: 1600 Royal Avenue, Jasper, IN 47549

Part 70 Permit No.: T037-6952-00085

Facilities: Wood Furniture Coating and Solvent -Twenty-eight (28) Spray Booths (SB1 - SB26;

I&K and 30)

Parameter: Combined HAPs

Limit: Less than 25 tons per consecutive 12 month period with compliance determined at the

end of each month